

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of)
Application No. 99-1)
) EXHIBIT _____ (AF-T)
SUMAS ENERGY 2, INC.)
)
SUMAS ENERGY 2 GENERATION)
FACILITY)
_____)

WHATCOM COUNTY'S PREFILED TESTIMONY
WITNESS # _____ : Axel Franzmann

Q: Please introduce yourself to the Council.

A: I am Axel Franzmann. I am employed by the Northwest Air Pollution Authority (NWAPA) as a Air Quality Control Specialist. I manage the ambient and industrial monitoring quality assurance program for NWAPA. My duties include such tasks as monitoring and testing industrial air emissions, overseeing the installation of air sampling equipment, and developing guidelines pertaining to ambient and stack monitoring. I have been so employed for the past 9 years. My education includes the degrees of Master of Science in chemistry and Bachelor of Science (*Magna Cum Laude*, majoring in Environmental Studies) from Western Washington University.

Q: What are the subjects of your testimony?

A: I will describe my review of the application materials relating to air quality impacts and the conclusions I have reached as to whether the projected impacts fall within regulatory guidelines.

Q: What application materials have you reviewed and considered?

A: I have reviewed a number of items of information relating to the application for the proposed Sumas Energy 2 Generation Facility, including: Sections 3.1 of the Draft EIS and Section 3.2 of the Application pertaining to air quality, and portions of the direct prefiled testimony of Eric Hansen and Katy Chaney relating to air quality.

Q: Do you have role in the permitting of the SE2 application?

A: As you know, the Northwest Air Pollution Authority (NWAPA) does not have jurisdiction for permitting this source. The Energy Facility Site Evaluation Council has contracted with

1 the Washington State Department of Ecology to do all air permitting. Therefore, my
2 review of the sections pertaining to the impact of the project on air quality was in no way
3 exhaustive, and merely represents my opinion based upon the projected emissions and
4 modeled ambient concentrations which were presented in the EIS. I am confident that the
Department of Ecology will most thoroughly scrutinize the final application before
granting a permit to operate.

5 Q: In your review of the above mentioned materials, are there any air quality impacts for
which we need to be concerned?

6 A: Clearly, any air pollution source has an impact on air quality. But, assuming that the
7 emission factors used to calculate the emissions were accurate, and the corresponding
8 models were applied correctly, it appears that the impact of Sumas 2 Generation Facility on
9 existing air quality, will be rather minimal. Whatcom County is in attainment for all
10 criteria pollutants and historically, pollutant levels have been well below the National
11 Ambient Air Quality Standards (NAAQS). The projected emissions, while adding to the
background concentrations, would not be sufficient to cause exceedances of any of the
12 NAAQS. Similarly, concentrations of air toxins attributable to the facility appear to be
below the Acceptable Source Impact Levels (ASILs), with only sulfuric acid mist
13 approaching the ASIL. The ASILs are screening values for air toxins to which new and
14 modified sources of air pollution are compared.

12 Q: During certain times of the year, SE2 has proposed to operate by burning oil instead of
13 natural gas, does that fact affect your overview of the air quality impacts?

14 A: I concur with the statement that conditions under which oil would be burned (limited to 15
15 days/year) and thus when maximum emissions would be generated, are most likely to occur
at times of the year when ambient impacts are mitigated by atmospheric conditions.

16 Q: Have you reviewed or analyzed the application materials in respect to the project's
17 projected impacts or lack thereof on nearby federally designated Class 1 or Class 2 areas?

18 A: I am not prepared, nor qualified to comment on the assessment of effects of the source
(SE2) on Class 1 or Class 2 areas and associated increment analysis. These are integral to
the PSD permitting process for which the NWAPA does not have delegation.

19 END OF TESTIMONY

20 I declare under penalty of perjury that the above testimony is true and correct to the best of
21 my knowledge.

22 Executed at Bellingham, Washington, on this 21st day of June, 2000.

23 By: _____
24 Axel Franzmann